

STEPHANIE M. HINDS (CABN 154284)
United States Attorney

THOMAS A. COLTHURST (CABN 99493)
Chief, Criminal Division

CHRISTINA LIU (CABN 308362)
DAN M. KARMELO (NYBN 5151485)
Assistant United States Attorneys

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7199, (415) 436-7007
FAX: (415) 436-7234
christina.liu@usdoj.gov, dan.karmelo@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. CR 19-584 RS
)	
Plaintiff,)	STIPULATION AND ORDER TO CONTINUE
)	CHANGE OF PLEA AND EXCLUDE TIME
v.)	UNDER THE SPEEDY TRIAL ACT UNTIL
)	APRIL 19, 2022
JONATHAN FLORES,)	
)	
Defendant.)	

On January 18, 2022, the parties appeared before the Court in this matter for a status conference. Dkt. 125 (Min. Entry). The Court heard from the parties on the status of plea negotiations and set the next hearing in this case as a status hearing on March 1, 2022 at 2:30 p.m. *Id.*

On February 28, 2022, at the request of the parties, the Court vacated the March 1, 2022 status hearing and scheduled a change of plea hearing for March 22, 2022 at 9:30 a.m. Dkt. 134 (Clerk's Not.).

On March 18, 2022, at the request of the parties, the Court continued the March 22, 2022 change of plea hearing to March 29, 2022 at 9:30 a.m. Dkt. 138 (Clerk's Not.).

On March 28, 2022, at the request of the parties, the Court continued the March 29, 2022 change of plea hearing to April 5, 2022 at 9:30 a.m. Dkt. 143.

1 The parties stipulate and agree that the United States has provided some discovery materials to
2 defense counsel, who will need time to continue reviewing these materials with defendant, to continue
3 negotiating a potential case resolution with the United States, and to continue assessing defendant's
4 options and next steps in this case.

5 Thus, the parties stipulate and agree it would be appropriate to continue the change of plea
6 hearing currently scheduled for April 5, 2022 to April 19, 2022 and to exclude the time from April 5,
7 2022 through April 19, 2022 under the Speedy Trial Act to allow for effective preparation of counsel,
8 taking into account the exercise of due diligence. *See* 18 U.S.C. §§ 3161(h)(7)(A), (B)(iv). The parties
9 further stipulate and agree that the ends of justice served by excluding the time from April 5, 2022
10 through April 19, 2022 from computation under the Speedy Trial Act outweigh the best interests of the
11 public and defendant in the prompt resolution of this case. *See id.*

12 The undersigned Assistant United States Attorney certifies that he has obtained approval from
13 counsel for defendant to file this stipulation and proposed order.

14 IT IS SO STIPULATED.

15 DATED: April 4, 2022

STEPHANIE M. HINDS
United States Attorney

17 /s/ Dan Karmel
18 DAN KARMEL
19 CHRISTINA LIU
Assistant United States Attorneys

20 DATED: April 4, 2022

21 /s/ with permission
22 SHAWN HALBERT
23 DARLENE COMSTEDT
Attorneys for Defendant Jonathan Flores

ORDER

Based upon the representations of counsel and for good cause shown, the Court finds that failing to exclude the time from April 5, 2022 through April 19, 2022 would unreasonably deny defense counsel and defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. *See* 18 U.S.C. §§ 3161(h)(7)(A), (B)(iv).

The Court further finds that the ends of justice served by excluding the time from April 5, 2022 through April 19, 2022 from computation under the Speedy Trial Act outweigh the best interests of the public and defendant in a speedy trial. *See* § 3161(h)(7)(A).

Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the change of plea hearing currently scheduled for April 5, 2022 is continued to April 19, 2022, and the time from April 5, 2022 through April 19, 2022 shall be excluded from computation under the Speedy Trial Act.

See id.

IT IS SO ORDERED this 4th day of April 2022.



THE HONORABLE RICHARD SEEBORG
United States District Judge